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From: Rao, Kate [Rao.kate@epa.gov]
Sent: 12/18/2020 2:46:57 PM

To: Albright, David [Albright.David@epa.gov]

Subject: FW: CES: evaluation of responses to RAI #2

Attachments: Cadmus evaluation of CES responses to RAI 2 (FR and E&RR).docx

FYI.

Kate Rao
Groundwater Protection Section (WTR 4-2)
USEPA Region 9
75 Hawthorne Street, San Francisco, CA 94105

tel: (415) 972-3533 / fax: (415) 947-3549

From: Shari Ring <Shari.Ring@cadmusgroup.com>

Sent: Friday, December 18, 2020 5:16 AM

To: Rao, Kate <Rao.kate@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>

Cc: Jim Jolley <james.jolley@cadmusgroup.com>; jameswalker733@outlook.com;

MaryEllen.Tuccillo@cadmusgroup.com; Kyrien Edwards <kyrien.edwards@cadmusgroup.com>

Subject: CES: evaluation of responses to RAI #2

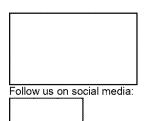
Hi Calvin and Kate.

Attached is Cadmus' evaluation of CES's responses to RAI#2 (emergency and remedial response and financial responsibility). A few notes:

- E&RR: We reviewed the updated risk register along with the E&RR Plan, but focused the review on their proposed edits to the Plan, since it (not the risk register) will be the enforceable condition of the permit.
- FR: Most of the financial responsibility evaluation will need to be updated when we receive updated cost estimates. If they are submitted early enough in January, we can update this document before you send the next round of questions to CES.

Please let me know if you have any questions.

Shari Ring The Cadmus Group LLC 703.247.6159



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